James Feenan

From: Max Yeh <maxwyeh@gmail.com>
Sent: Thursday, March 7, 2024 11:53 AM
To: pbscommissions
Cc: pb@mcn.org; sf_pjm@earthlink.net; kengio78@gmail.com; Rihan; lhatofsky@mcn.org; dbburke@mcn.org; Norman de Vall; katgio53@gmail.com; claudiab@mcn.org; daveygjones@msn.com; smaeder@mcn.org; nikolas_stergios@hotmail.com; toddwalton@mcn.org; monicast@earthlink.net; Alan McReynolds; Rich Jung; pizzicato@pacific.net
Subject: Second Comment on MUSD's water project.
Attachments: Final Second Public Comment.pdf

Dear Commissioners,

Attached please find my Second Comment on Case #U_2023-0004.

Thank you.

--
Max

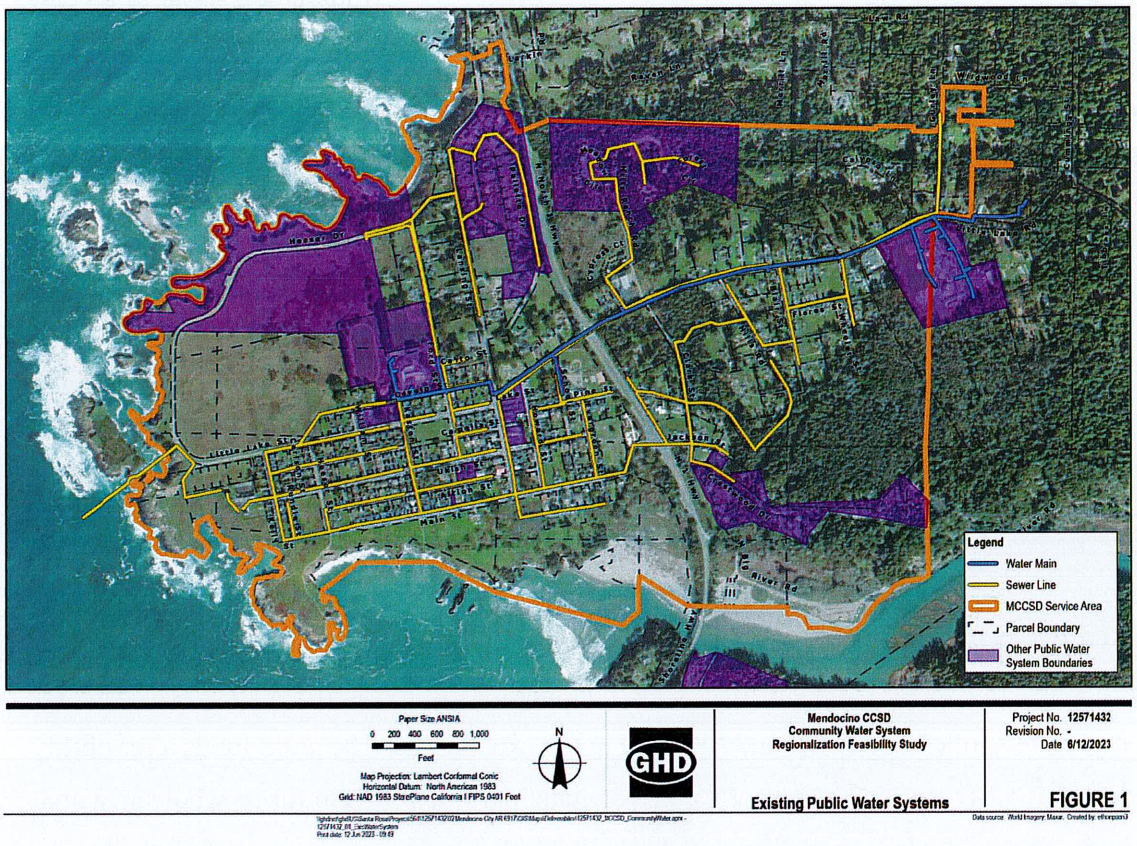
To: Mendocino County Planning Commission
From: Max Yeh
10800 Cummings Lane
Mendocino, CA
maxwyeh@gmail.com
Date: March 5, 2024
Re: Case U_2023-0004
Mendocino Unified School District
Coastal Development Use Permit
Second Public Comment

I. Introduction

Since my initial Public Comment, dated February 28, 2024, a document pertinent to Case U_2023-0004 has come to my attention. I append this pubic document, *Technical Assistance (TA) Work Plan, Work Plan No. 6917-A* (January 9, 2024), as Appendix I ("TA"), but it has also been posted on the Commission's website as a public comment submitted by the California State Water Resources Control Board.

The TA authorizes a payment of over $400,000 from California Water Resources Control Board's SAFER funds (Safe and Affordable Funding for Equity and Resilience) to GHD, Inc., agent for the applicants MUSD and MCCSD in the extant case. The grant funds a feasibility study of MCCSD's project to create a unified municipal water system for its whole area and beyond. The work plan was initiated in April, 2023, that is several months before the Lead Agency's pubic hearing on its FSMND. One assumes that MUSD knew of this project before its approval of the Negative Declaration. Included in the TA are an outline of MCCSD's proposed project, brief descriptions of related projects, a budget, a survey of private water systems MCCSD would need to incorporate, and listings of potential users as well as sources of water outside MCCSD jurisdiction (suggesting a necessary expansion of MCCSD). Elements of this project relate to the present case before the Commission.

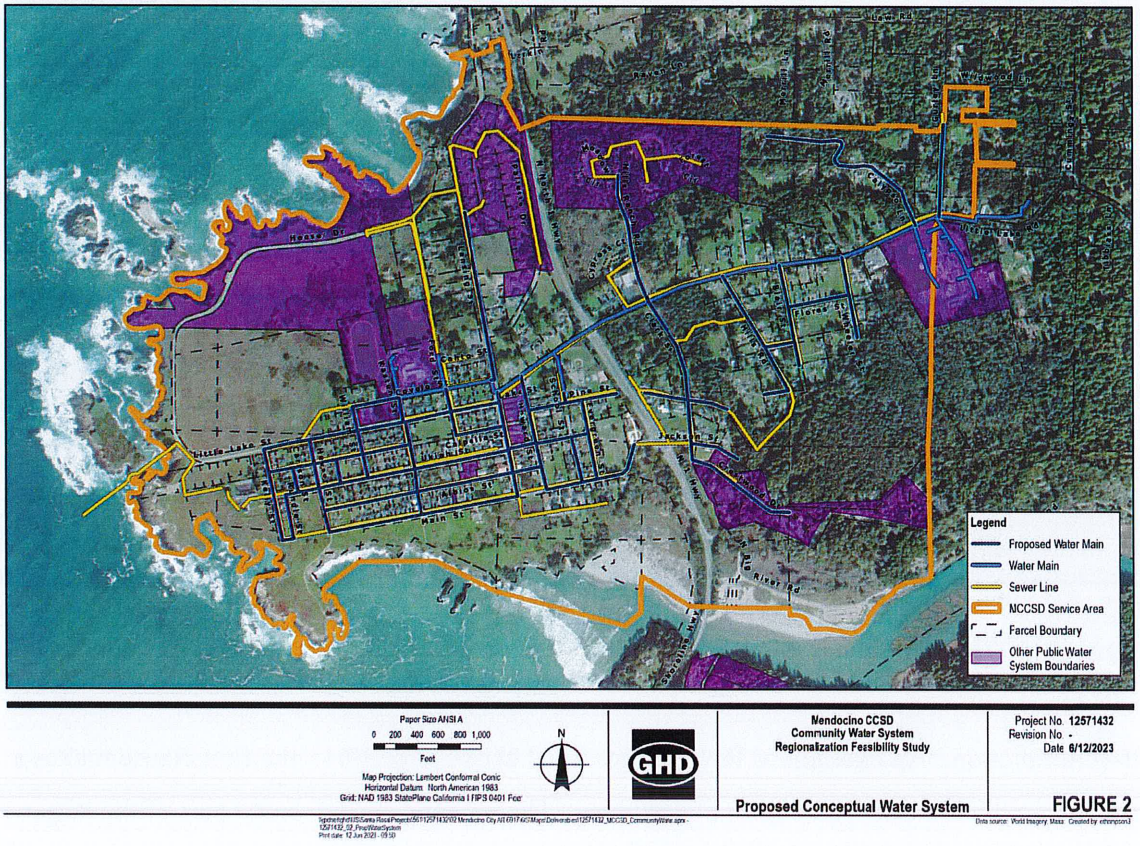
II. U_2023-0004 and the Projected Municipal Water System



The TA's Figure 1(above) shows both water and sewer lines in MCCSD. The blue line, designated as "Water Main," represents MUSD's existing system which draws water at its eastern end, at the location of the U_2023-0004 site outside of the MCCSD, and delivers water to its properties within MCCSD at the K-8 school, the high school, Friendship Park playing field, the Mendocino Community Center. This system is described in MUSD's *Recycled Water System Project (Initial Study/Proposed Mitigated Negative Declaration)*, February 23, 2022. See the project description excerpted from this document in Appendix II. The 2022 proposal changes MUSD's single water system into tandem parallel systems separating potable from non-potable

(irrigation and fire hydrants) uses. The non-potable system would circulate recycled water from MCCSD's treatment plant.

The present emergency water system before the Commission is intended to be part of this MUSD water system. This fact is evidenced in the FSMND at p. 1-10: "Water deliveries would involve filling an approximately 3,500-gallon to 4,000-gallon water truck from a metered fire hydrant or from the MUSD's water supply and storage site." That hydrant can only be MUSD's hydrant in its water system. Therefore, the emergency tanks and wells of the U_2023-0004 project (the emergency water project) will be connected to MUSD's water system.



The TA's Figure 2 (above) shows MCCSD's proposed municipal system, the feasibility of which GHD is to study. The Commission will notice that the backbone of this system – the main water

line off which the whole proposed municipal system (in dark blue) depends – is MUSD's present water line, into which the emergency waters of this instant application will flow.

The TA itself discusses (p. 5) GHD's role in both MUSD's original limited project for renovating its water system (U_2022-0012 and CE-2020-0043, both approved) and in expanding that earlier project by the extant U_2023-0004 project, presumably, as projects related to MCCSD's municipal water system project.

The emergency water project before the Commission, the drilling of 10 new wells with a combined outsized capacity, is clearly part of a larger project and related to other parts of this larger project. Yet, the FSMND denies that connection (at p. 3-61): "The Modified Project is not part of a potential future larger community water system and such a future water system project would not be required to fully utilize the design capabilities included in the Modified Project."

III. The Municipal System Project Casts a Shadow on the FSMND

The Commission and the public rightly expects the FSMND to be clear and explicit. CEQA says that it is the policy of the state that "Documents prepared pursuant to this division be organized and written in a manner that will be meaningful and useful to decision makers and to the public." CEQA §21003(b). But the possibility of a future municipal system disturbs many sentences in the FSMND, turning clear and explicit declarations into ambiguity, in a kind of self-denial or self-contradiction. An example is the sentence cited above at p. 3-61: the first clause makes a declaration which the second clause undermines. The extant project is not a part of the larger project, but then it might be part of it, just not completely.

A similar declaration followed by a partial retraction is seen in the Staff Report at p. PC-12, quoting from the Response to Comments (June, 2023): "As noted in the Memorandum of

Understanding, if subsequent hydrological testing shows that the water cannot be extracted without negatively impacting neighboring wells, including MUSD's existing wells, then the wells would not be developed for potable water production." That this sentence does not end with the word "developed" curiously suggests that the writer allows for the possibility that the wells might be developed for non-potable water production. To be used in the planned recycle water system for irrigation and fire suppression?

In another response to comments on the SMND, and later incorporated into the FSMND at p. 1-9, the declaration states that emergency water would be accessed during federally or state declared drought "or when a MCCSD-declared water shortage emergency has been issued." Since this response specifically addressed my criticism of the indefiniteness in SMND's use of the word "drought" to describe what triggered the use of emergency water, the first part of the response clearly and definitely defines the term only to turn around in the latter part to leave the matter in the hands of MCCSD. The answer's own indefiniteness proclaims MCCSD's discretionary control of its municipal water system, its control of the emergency water in terms of its own needs, thus making the emergency water a backup for its whole projected municipal system.

We perceive ambiguous intent in other aspects of writing in the FSMND. For example, why does funding for an emergency system bring into consideration the daily water needs of 855 MCCSD members and 2,500 tourists, MCCSD's entire water requirement, when even during the most severe drought the area did not go completely dry? Could it be because ultimately one wants to consider what portion of the overall needs of the district this extant project might supply? I understand that the MCCSD board has actually discussed this question. See MendoMatters comment on the SMND, June 28, 2023.

Or, why does the Hydrogeological Report spend so much time detailing the situation of the village, its wells, its hydrology, and its needs when its ostensible function is to inform the public and other agencies of the effects of pumping on a shallow aquifer a mile up-gradient of the village? Could the writer have the larger picture in mind?

Or, why is there so little concern that the present project might intercept groundwater flow into the village and thus disrupt supplies there? The local flows at the project site are completely unknown. Somewhere in the various hydrologic studies GHD has done, there is even mention of the possible existence of a previously unknown terrace formation in the locality. I invite Commissioners to drive by the site. At the junction of Little Lake Road and Gurley Lane -- that is just southwest of the proposed well-field -- one sees wetlands on both sides of Little Lake Road, Topographically, the one on the north side feeds into Slaughterhouse Gulch to the northwest; the one on the south side topographically might feed water to the south or the west, that is towards Big River or towards Mendocino Village. We have no idea if this is a single wetlands divided by the building of Little Lake Road, or if these evidence two distinct underground flows. There is a possibility that the proposed well-field would intercept groundwater flow either to the Big River watershed and/or to the village, thus impacting village wells. An aquifer model can answer that question. Is the FSMND's silence over this possible impact because, with the municipal system in place, the village would access this water anyway?

IV. CEQA Guidelines and Multiple Projects

This project began as simply a renovation of MUSD's aging water system. It has grown to incorporate a project that potentially can extract five to ten times as much water from the ground without an adequate prior aquifer study. With the information provided by the TA, the project appears to grow into an even larger construction project covering the entire district and a mile beyond. The problem facing the Commission is how to deal with a series of *faits accomplis*, of segmented facts on the ground, of creeping incrementalization. Impacts and mitigations which might be accurate for projects viewed in isolation may change their character and efficaciousness entirely when that project is coupled with another.

In addition, U_2023-0004 itself combines two distinct projects, MUSD's renovation project and MCCSD's emergency water project. CEQA has provisions on how a Lead Agency should deal with multiple related projects:

> CEQA Guidelines, §15165. MULTIPLE AND PHASED PROJECTS
> Where individual projects are, or a phased project is, to be undertaken and where the total undertaking comprises a project with significant environmental effect, the Lead Agency shall prepare a single program EIR for the ultimate project as described in Section 15168. Where an individual project is a necessary precedent for action on a larger project, or commits the Lead Agency to a larger project, with significant environmental effect, an EIR must address itself to the scope of the larger project. Where one project is one of several similar projects of a public agency, but is not deemed a part of a larger undertaking or a larger project, the agency may prepare one EIR for all projects, or one for each project, but shall in either case comment upon the cumulative effect. Note: Authority cited: Section 21083, Public Resources Code; Reference: Sections 21061, 21100, and 21151, Public Resources Code; *Whitman v. Board of Supervisors*, (1979) 88 Cal. App. 3d 397

MUSD argues (FSMND, pp. 3-60 through 3-62) that the related water projects are not advanced enough to make meaningful determinations of impacts. The argument is backwards. It is precisely because we don't know about the other parts of related projects that this present project must be scrutinized thoroughly. That is why §15165 calls for EIRs, not Negative Declarations, when related projects are separately presented.

Further, legislative instructions for the creation of CEQA Guidelines specify

> CEQA §21083(b): The guidelines shall specifically include criteria for public agencies to follow in determining whether or not a proposed project may have a "significant effect on the environment." The criteria shall require a finding that a project may have a "significant effect on the environment" if one or more of the following conditions exist:
>
> (1) A proposed project has the potential to degrade the quality of the environment, curtail the range of the environment, or to achieve short-term, to the disadvantage of long-term, environmental goals.
>
> (2) The possible effects of a project are individually limited but cumulatively considerable. As used in this paragraph, "cumulatively considerable" means that the incremental effects of an individual project are considerable when viewed in connection with the effects of past projects, the effects of other current projects, and the effects of probable future projects.

(3) The environmental effects of a project will cause substantial adverse effects on human beings, either directly or indirectly.

The Commission should find that viewed in connection with the other current projects, the present project might be cumulatively considerable. Thus the use of the Negative Declaration is inappropriate.

V. CEQA and Project Description

The courts have ruled that CEQA intends environmental documents that describe the effects and mitigations of a project must adequately inform regulatory agencies and the public. In *County on Inyo v. City of Los Angeles (1977)* Cal.App. 3d 185; *Ocean Street Extension Neighborhood Assoc. v. City of Santa Cruz (2002)* 73 Cal.App. 5Th 985; *San Joaquin Raptor Rescue Center v. County of Merced* (2007) 149 Cal.App. 4th 645; and in *Buena Vista Water Storage District v. Kern County Water Authority* (2022) Cal.App. 5Th 576 the courts ruled that an EIR must be accurate, stable, and finite, sufficient to its intended uses. For the instant case the key words are "stable" and "finite." A project considered in isolation without regard to clearly related other projects as in the FSMND is simply not stable nor definite. Not being accurate, stable, and finite, the FSMND is not "meaningful and useful for decision makers and the public," required of all CEQA documents in CEQA §21060.3.

Since the Negative Declaration is the document, like the EIR, which decision-makers, other affected agencies, and the public must use to evaluate and review the project, to balance its benefits against its costs, to consider the mitigations and alternatives, it needs to meet as rigorous a standard of adequacy as a full EIR, especially regarding its project description. The FSMND fails that standard.

In part, it fails to provide sufficient information for the public and for Responsible Agencies because the Negative Declaration in form limits a full consideration of a project's effects. A

Negative Declaration focuses on mitigations of perceived effects, but it does not provide a full study of what those impacts might be. That short cut reasonably reduces costs, time, and wasted energy for projects with easily perceivable outcomes. But groundwater is invisible; its situation, flows, and changes are difficult to know. Yet, in this extant project a thorough understanding of groundwater is obviated by the use of the Negative Declaration. Its use in this case allows for minimizing the serious issue of groundwater in this project. Look at the title of the FSMND: *Water System Reconstruction Project – Water Supply and Storage Improvements*. Increasing the possible extraction of water by 5 or 10 times is much more than an "improvement." Look at the resolution that the Commission is asked to sign: it does not even mention the drilling of 10 or 11 wells. See the Staff Report attached to the February 20, 2024, Notice of Public Hearing.

VI. Another Deficiency

The FSMND states the aim of providing emergency water for fire protection, but it is completely silent on this usage, increasing the document's instability and indefiniteness. Is such a consideration exempt from CEQA? If so, the document needs a declaration of exemption. If not, the lack is a serious deficiency. It is unclear if MUSD controls fire department access to the emergency water because it owns the hydrants or if MCCSD controls that access because it controls the discretionary power to declare an emergency. What documents describe the relation between MUSD and MCCSD with which of the various fire departments that might be involved? Will the water be used solely for conflagrations within the MCCSD, or will it be accessed by Calfire or the Mendocino Volunteer Fire Department for use, let us say, on Cummings Lane? Will the lines be maintained for fire standards as to pressure and adequacy of supply? What are the statistics as to the past needs of the various fire departments? What are the expectations as to quantity of water needed?

VII. Conclusion

The FSMND does not provide the Commission nor the public with sufficient information to judge the project's impacts on sustainable water sufficiency and thus not enough information to judge if the mitigations are adequate. Partly, the failure results from the Lead Agency's decision to use the Negative Declaration form for describing effects. This choice hides the possible cumulative impacts stemming from the relationship between the two projects combined in this application and from the relationships between this project and the hoped for municipal water system. Partly also the failure results from MUSD and MCCSD's joint decision to use MCCSD's rules for new wells within its district, which provides for a post-drilling hydrological report focused on well interference rather than a pre-drilling hydrological study of the aquifer in order to determine sustainability. That decision not only puts MUSD at risk of violating California water law but leads the planners to an impasse where the wells cannot be drilled without violating its own rule.

The FSMND does not satisfy either the letter or the spirit of CEQA. I urge the Commission to reject the application with stipulations as to what information it needs to judge the project's merits and effects.

The authority to decide between a Negative Declaration and an EIR rests with the Lead Agency, not the Responsible Agency. The Commission cannot demand an EIR from MUSD. It can, however, specify that an aquifer study be presented as part of the application and that that study include modeling of quantified directions of flow, not only in the saturated layer but in the unsaturated vadose layer, with special attention to the root zone (because in this forested location most the rainfall is taken up by the trees, a situation entirely different from that in the village). It can ask for an aquifer study with sustainability in mind. Such a study must be able to determine reasonably if excess water is indeed present so that MUSD can export shared water off-property for MCCSD's use.

In conclusion, I remind the Commission that California water belongs to the people, that MUSD does not own the water under its property, and that MCCSD has no right to access that water.

MUSD's Response to Comments does an enormous disservice to the CEQA process in answering my warnings of water law violations by citing at length from a standard manual on real estate law. Water is not real estate.

APPENDIX I

Technical Assistance (TA) Work Plan 6917-A

TECHNICAL ASSISTANCE (TA) WORK PLAN

GHD INC. (RECIPIENT)
AND
CALIFORNIA STATE WATER RESOURCES CONTROL BOARD

SAFE AND AFFORDABALE FUNDING FOR EQUITY AND RESILIENCE DRINKING WATER TECHNICAL ASSISTANCE PROGRAM (PROJECT)

AGREEMENT NUMBER (NO.) D2217018

TA WORK PLAN NO. 6917-A
TA START DATE: April 19, 2023

AMOUNT: $446,094.00

Whereas through the passage of Senate Bill 200 in July 2019, the State Water Resources Control Board (State Water Board) is authorized to make Safe and Affordable Drinking Water Funds (SADW Funds) available for projects meeting certain criteria; and

Whereas the State Water Board has determined that this Project is eligible for certain SADW funds;

Therefore, the parties hereby amend the Agreement, originally executed on April 12, 2023 and incorporated herein, to add:

TA WORK PLAN NO. 6917-A (14 pages attached) **
** Entire Exhibit Added

All other terms and conditions shall remain the same.

RECIPIENT:

By: _____
Name: Sridhar Sadasivan
Title: West Region GM/ Executive VP
Date: Jan 8, 2024

STATE WATER RESOURCES CONTROL BOARD:

By: _____
Name: Joe Karkoski
Title: Deputy Director, Division of Financial Assistance
Date: Jan 9, 2024

Technical Assistance (TA) Work Plan

TA Type:	☒ Drinking Water ☐ Wastewater ☐ Storm Water ☐ Groundwater
Grant Agreement No.:	D2217018
TA Start Date:	04/19/2023
TA Recipient(s):	Mendocino City Community Services District (MCCSD)
Community/System Information:	Population Served: 855 (currently providing sanitary sewer services) Number of Connections: NA (no current drinking water connections) Median Household Income (MHI): $73,616 MHI Source: 2021 American Community Survey (ACS) Data
Community/System Contact:	Ryan Rhoades, MCCSD Superintendent, [redacted], mccsd@mcn.org
Work Plan No.:	6917-A
Work Plan Title:	Mendocino City Community Services District – Community Water System Regionalization Feasibility Study
Work Plan Submittal Date:	12/21/2023

A. Technical Assistance Details

Water System Description:

The Mendocino City Community Services District (MCCSD) currently provides public sanitary sewer services to approximately 855 people within their service area boundary which encompasses the Village of Mendocino. The MCCSD has submitted a TA request for support in planning and design for a regional water system with the goal of providing potable water service to connections within and possibly outside their service area boundary.

There are several Community Water Systems (CWS), as shown in Figure 1, within the MCCSD service area boundary that have been identified as potential consolidation partners: Point of View Mutual Water Company (MWC, CA2300604), Hills Ranch MWC (CA2300832) and Big River Vista MWC (CA2300596). These systems serve a combined population of 171 people per the Safe Drinking Water Information System (SDWIS) database.

There also are multiple Transient Noncommunity (TNC) and Nontransient Noncommunity (NTNC) Public Water Systems within the MCCSD service area boundary that have been identified, either as additional potential consolidation partners or as future regional water system service connections. They include: Hill House Limited Liability Corporation (LLC, CA2300746), California State Parks-Mendocino Headlands (CA2310308), Manchester Union Elementary School (CA2300826), Mendocino School District (CA2300584), Harvest at Mendosas (CA2300802), Green Real Estate Enterprises LLC (CA2300804), MacCallum House Inn (CA2300740), Mendocino Hotel (CA2300628),

Mendocino Art Center (CA2300821) and Dick's Place (CA2300872). Also, there could be additional TNC or NTNC systems within the service area boundary that wish to connect.

Point of View MWC (CA2300604) serves approximately 36 residential and 20 transient customers through 30 metered connections along Palette Drive in Mendocino and is within the MCCSD service area boundary. The system is supplied by four (4) wells (Wells #2, 3, 4 and 5). The system also has disinfection treatment and a 30,000-gallon redwood tank. There are no violations within the system in the last 5 years. The distribution system consists of 2-inch polyvinyl chloride (PVC) raw water piping and 4-inch asbestos cement (AC) finished water piping as well as 1-inch plastic service lines.

Hills Ranch MWC (CA2300832) serves approximately 79 residential customers through 48 metered connections. The system also serves the Mendocino Volunteer Fire Department on Little Lake Road. The water system is located east of Highway 1 and north of Little Lake Road and is within the MCCSD service area boundary. The system is supplied by four (4) wells (Wells #2, 4, 11 and 13) and has two (2) storage tanks. There are no violations within the system in the last 5 years. The distribution system consists of 2-inch PVC raw water piping and 6-inch and 12-inch PVC distribution system piping and hydrants.

Big River Vista Mutual Water Company (CA2300596) serves approximately 36 residential customers through 19 metered connections. The system is located east of Highway 1 and south of Little Lake Road and within the MCCSD service area boundary. The system is supplied by one (1) well (Well #1), and has one (1) 40,000 gallon storage tank. There are no violations within the system in the last 5 years. The distribution system consists of 4-inch AC piping and wharf hydrants.

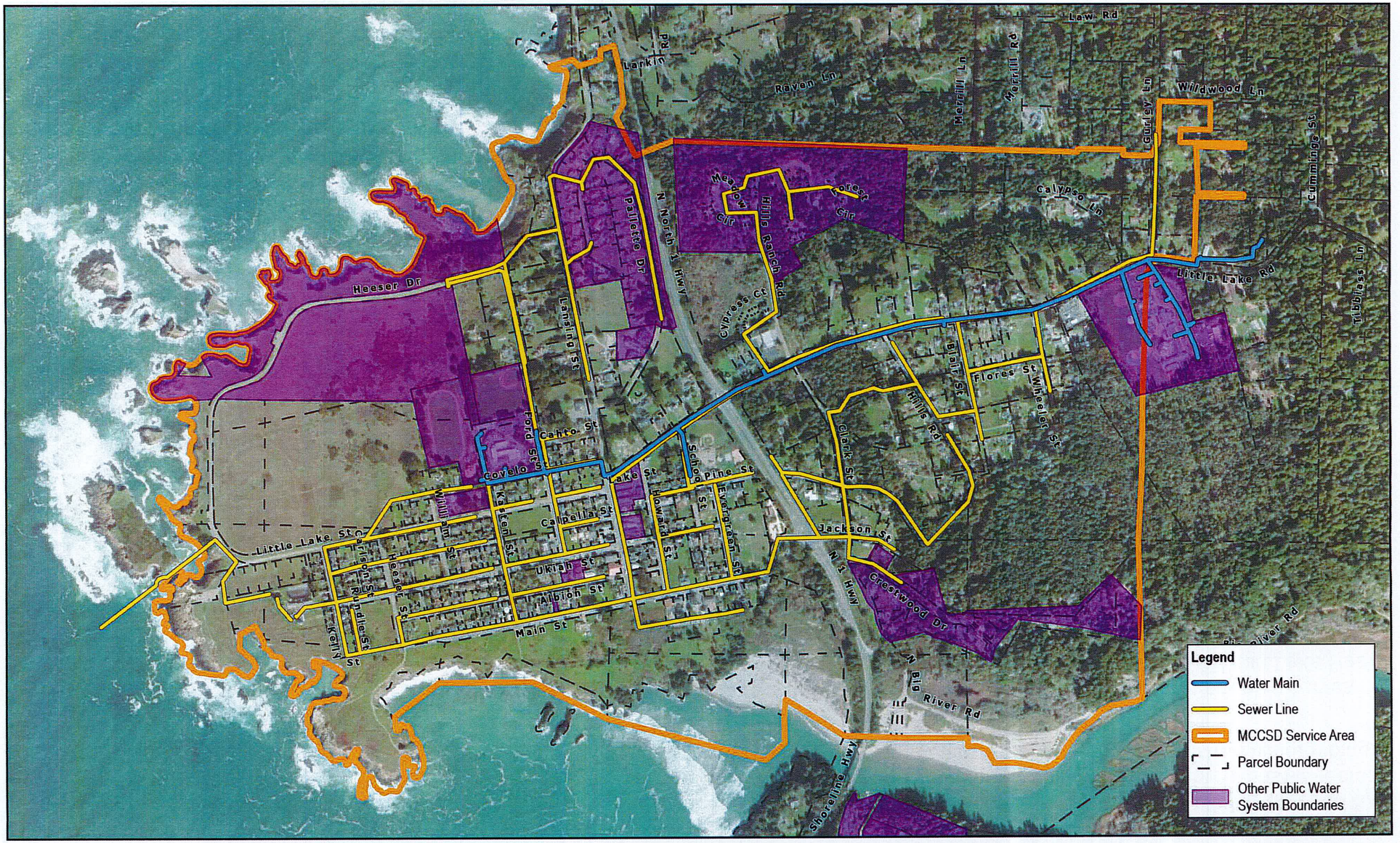
Remaining parcels within the MCCSD service area receive their water from private wells.

The MCCSD has requested technical assistance to prepare a consolidation feasibility study to determine whether the systems could be consolidated and a regional CWS established with MCCSD as the restructured water system owner and operator.

Current and Past Compliance Issues:

The CWSs within the MCCSD service area boundary have had no violations within 5 years and are in compliance as of December 2023. Likewise, the TNC and NTNCs within the area have had no recent violations. Among more-distant systems that might be considered for consolidation, Surfwood Mutual Water Corporation (CA2300590) to the north has had repeated violations for disinfection byproducts (both total trihalomethanes [TTHM] and haloacetic acids [HAA5] maximum contaminant levels [MCLs]), and Pomo Campground (CA2300629) to the south has had monitoring violations.

The existing public water systems within the MCCSD service area boundary may have needs for additional capacity, storage, or treatment to improve the reliability of their systems. Those needs will be further identified as part of this Work Plan.



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GHD

Mendocino CCSD
Community Water System
Regionalization Feasibility Study

Project No. **12571432**
Revision No. **-**
Date **6/12/2023**

Existing Public Water Systems

FIGURE 1

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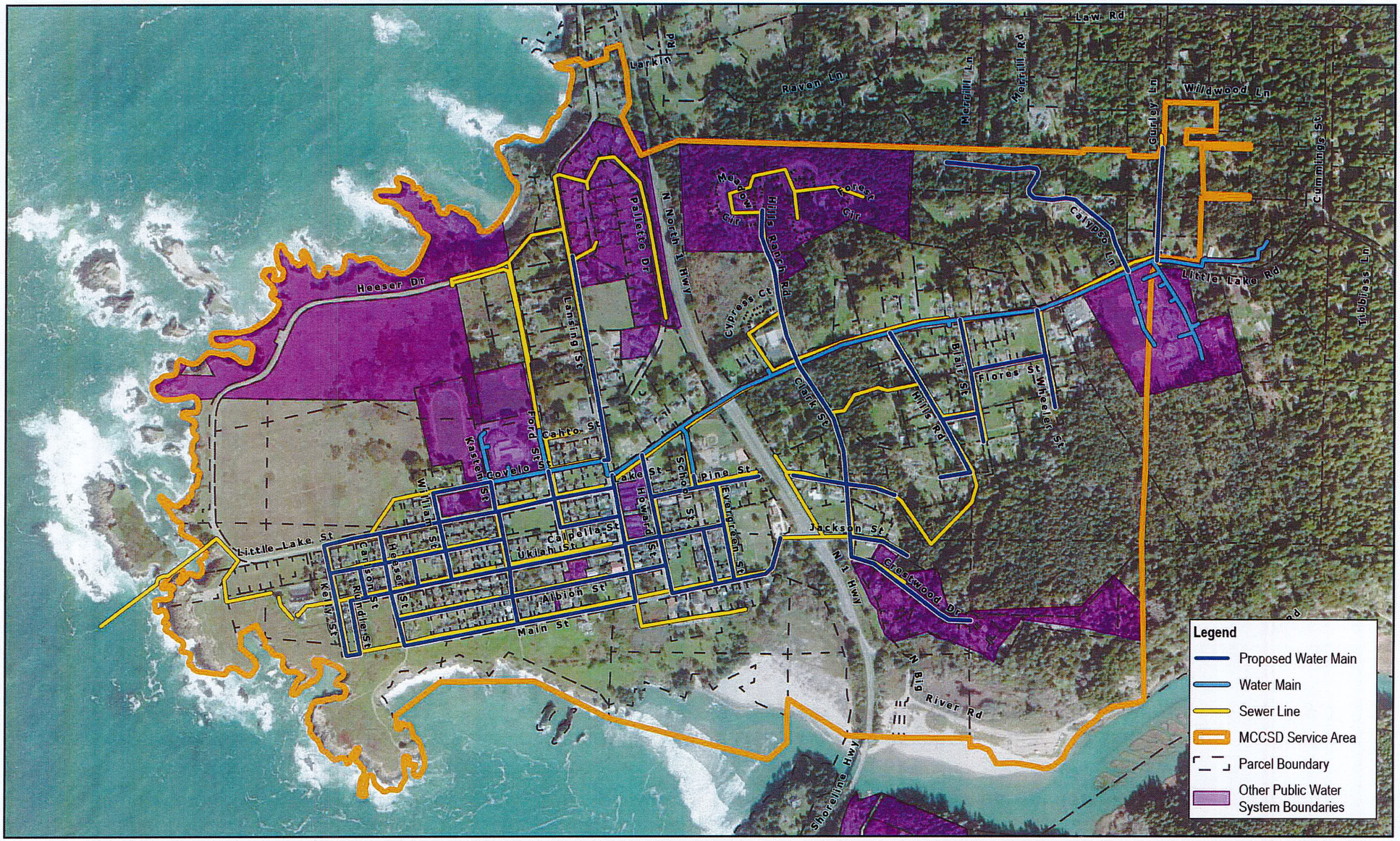

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GHD

Mendocino CCSD
Community Water System
Regionalization Feasibility Study

Project No. **12571432**
Revision No. **-**
Date **6/12/2023**

Proposed Conceptual Water System

FIGURE 2

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Need for Technical Assistance:

There is currently no regional CWS serving the residents and businesses of the Village of Mendocino. Residents and businesses not served by the smaller Public Water Systems rely on individual private wells. These wells typically have low production rates (generally ranging from 1 to 5 gallons per minute), and many shallow and hand-dug wells stop producing annually during the dry season and/or during periods of drought. During dry months, water is widely purchased from nearby water systems, hauled by water transporters, and pumped into individual private water tanks, which generally range in size from 1,000 to 5,000 gallons.

The area's water supply issue has been exacerbated by persistent drier conditions which may be attributed to climate change. During the 2020/21 drought, water supply became a crisis when wells ran dry, tanks were empty, and neighboring water systems such as the City of Fort Bragg did not have capacity to provide water for sale to outside users.

MCCSD is the local groundwater manager based upon the Groundwater Extraction Permit Ordinance, but has no permitted CWS, no water storage, and no water supply source/system.

This project will assist MCCSD and the larger Mendocino community in the preparation of a Regional CWS Feasibility Study. This study is needed to identify a long-term solution for the community.

To satisfy the first five (5) components of the Engineering Report Guidelines provided in the Technical Package of the DWSRF construction financing application, an alternatives analysis is required in the feasibility study. Three (3) alternatives for a regionalized CWS will be identified and evaluated in the feasibility study.

GHD has been engaged with Mendocino Unified School District (MUSD) since 2017 developing solutions to address system compliance issues raised by the Division of Drinking Water (DDW). These included inadequate source protection, water quality monitoring and alarms, general system condition issues, and long-term plans for the water system. Through a Drinking Water State Revolving Fund (DWSRF) Planning Grant, GHD prepared a water system plan, identified assets at the end of their useful service life, and prepared a project design that addresses asset condition and source protection issues. The design included a new treatment and control building with new equipment, new water tanks, a new well, and rehabilitation of the two existing wells. The environmental documentation (CEQA Initial Study/Mitigated Negative Declaration) was completed in 2021 and the design was completed in June 2022. Funding for construction through a DWSRF Construction Grant was approved in early 2023.

Prior to completion of the design, GHD was also engaged by MCCSD to assist in obtaining funding through the Urban and Multibenefit Drought Relief (UMBDR) Program to construct 500,000 gallons of storage and up to 10 wells on the MUSD-owned property that contains the water tanks and wells. The selection of the MUSD property for these improvements was made in coordination with MUSD. The intent of the project is to develop additional supply and storage that would serve as an emergency source of potable water for the Village of Mendocino during drought conditions (when wells go dry and neighboring water systems are unable to provide water). The application for the UMBDR grant was submitted in December 2021, notice of award was received in March 2022, and the planning and design of the wells and storage began in July 2022. The alternatives analysis determined that the most feasible and cost-effective approach was to combine

the storage with the MUSD replacement tanks and drill wells in the existing well field. The design of this project was completed in June 2023.

B. Summary of Proposed Deliverables and Activities

No.	Task	Notes and Details Regarding Related Activities	Lead TA Provider staff/consultant(s)	Deliverable & Due Date[1]	Budget[2]
1	Perform Needs Assessment and Prepare Work Plan	• Identify the Technical Assistance (TA) Work Plan stakeholders. • Conduct a kickoff meeting with stakeholders; distribute meeting agenda and notes. • Identify the scope of TA, deliverables, schedule, and budget. • Prepare a draft work plan and distribute to all project stakeholders for review and comments. • Prepare a final work plan incorporating review comments and submit to the State Water Board Project Manager for the Division of Financial Assistance's (Division) approval.	GHD - Holly Cinkutis	Technical Assistance Work Plan – Complete	$35,863.00
2	Conduct Community Outreach and Education Services	• Identify Stakeholders, including CWSs, interested TNC and NTNC water systems, and domestic well users in the MCCSD service area, and compile their respective contacts. Create community contact lists. • Conduct up to six (6) one-on-one conversations with possible potential system connections including domestic well users. Prepare and deliver online interest survey for residents within the determined boundary area. • Provide oversight, coordination and tracking of community outreach efforts. • Develop content to support project outreach. Build out key messaging for project, solicit interview opportunities and coach spokespeople on responses.	West Business Development Center - Mary Anne Petrillo	Draft and Final outreach materials (surveys, press releases, letter regarding community event & invitation, monthly progress reports, community engagement list(s)),	$104,791.00

No.	Task	Notes and Details Regarding Related Activities	Lead TA Provider staff/consultant(s)	Deliverable & Due Date[1]	Budget[2]
		• Coordinate two (2) in-person community meetings to introduce goals and phased project scope, introduce project team, foster engagement and gather feedback, present the outcome of the study and options forward. Assumptions and Exclusions: • Materials will be submitted to the DFA Project Manager for approval prior to circulation. Presentation materials and meeting time and location will be submitted to the DFA Project Manager at least five (5) business days prior to the event. • Up to one GHD staff member will attend each community meeting. • MCCSD Staff will support West Business in conducting one-on-one conversations with potential system connections. • GHD will coordinate with West Business Center in the preparation of presentation materials. GHD will prepare presentations (Microsoft PowerPoint), figures/maps, technical talking points, and study findings/conclusions, and review West Business Center presentation content for technical accuracy. • Only WBDC will contact stakeholders with communication related to the Community Outreach task, however GHD will be in contact with the CWSs to obtain information needed for the studies.		consolidated feedback report(s), meeting minutes and presentation materials – 11/29/2024	
3	Prepare Alternatives Analysis Engineering Report	• Prepare a Request for Information (RFI) to collect data from the Construction Funding Applicant and relevant stakeholders.	GHD - Holly Cinkutis	Draft Alternatives Analysis Engineering	$143,800.00

No.	Task	Notes and Details Regarding Related Activities	Lead TA Provider staff/consultant(s)	Deliverable & Due Date[1]	Budget[2]

		• Using information obtained during the Source Water Study efforts, prepare a Draft and Final Alternatives Analysis Engineering Report, assessing up to three (3) alternatives for a regionalized CWS. The Engineering Report will include the first five (5) sections described in the Technical Application Instructions for a DWSRF construction financing application:
		  • Executive Summary
		  • Background Project Information
		  • Problem Description
		  • Consolidation Analysis
		  • Alternatives Analysis (Parts 1-7)
		▪ Develop a conditions assessment of the existing CWS water distribution systems. The purpose of this task is to evaluate the condition of the CWS water distribution systems and assess asset condition. This will include performing a desktop review of available information related to the distribution systems, which will be summarized in the Alternatives Analysis Engineering Report.
		
		Assumptions & Exclusions:
		• Each alternative will include some combination of consolidation of the existing public water systems, alternative distribution system layouts, and treatment and storage options.
		• One (1) site visit at each CWS will be conducted.
		• Cost estimates will be developed based upon American Association of Cost Engineers (AACE)
				Report – 07/12/2024
				
				Final Alternatives Analysis Engineering Report - 11/29/2024	

No.	Task	Notes and Details Regarding Related Activities	Lead TA Provider staff/consultant(s)	Deliverable & Due Date[1]	Budget[2]
		Level 4 estimates, as appropriate for Feasibility Studies. • Potholing of utilities is not included in this work plan. • Survey is not included in this work plan. • Geotechnical Investigation is not included in the work plan. • A Rate Study or Financial Investigation is not included in this work plan. Once an Alternative is selected; water sources are identified and a viable option revealed, financial investigations can commence.			
4	Source Water Study	• Collect and summarize water supply assets and associated conditions and estimate annual supply capacity (during drought and normal conditions) of each existing CWS within the MCCSD Service Area Boundary. • Collect and review available well logs and driller well completion reports for existing wells within the MCCSD Service Area Boundary and one mile beyond the boundary. • Investigate water source options inside and outside the MCCSD service area boundary. Sources may include groundwater from shallow aquifer wells, groundwater from the deep bedrock aquifer wells, groundwater from areas up to 1 mile from Mendocino, surface water from the Jack Peters Gulch Basin, surface water from the Big River, desalination of groundwater from Big River Basin, desalination of seawater. • Prepare a Draft and Final Source Water Study which will include a list of source water options and	GHD - Ryan Crawford	Draft Source Water Study Report – 06/28/2024 Final Source Water Study Report – 11/1/2024	$115,240.00

No.	Task	Notes and Details Regarding Related Activities	Lead TA Provider staff/consultant(s)	Deliverable & Due Date[1]	Budget[2]
		construction cost estimates for source water options will be developed for use in the Alternatives Analysis Engineering Report. Assumptions & Exclusions: • One (1) site visit at each CWS will be conducted and up to three (3) site visits to wells or source water options within and one mile beyond the MCCSD Service Area Boundary. • Transducers or flow meters will not be installed at wells. • Background information sufficient to determine flow and water quality data associated with each asset will be provided by each CWS within 30 days of Workplan NTP.			
5	Project Management	• Conduct up to 12 project meetings; distribute agenda and meeting notes for each meeting. • Upload work plan deliverables to FAAST. • Coordinate with the State Water Board Project Manager on Work Plan execution and provide response to questions. • Monitor work plan scope, schedule, and budget. • Provide project management services, as needed, to support the implementation of the Work Plan. • Prepare Assistance Request (AR) close-out summary upon completion or cancellation of the TA work plan.	GHD - Holly Cinkutis	AR Close Out Summary – 11/29/2024	$46,400.00

[1] Deliverables shall be uploaded to the Financial Assistance Application Submittal Tool unless otherwise specified, Final deliverables associated with a funding application shall be uploaded to the FAAST proposal identification number (PIN) for the application. All other deliverables shall be uploaded to the FAAST PIN associated with this Project.

[2] Budget may be shifted between tasks upon written approval from the State Water Board Project Manager.

C. Total Budget (direct costs, including fringe)[1]

Budget Category	Total Amount Requested
Personnel	$362,503.00
Expenses and Supplies	$1,000.00
Equipment (>$5,000)	$0.00
Travel	$2,700.00
Professional and Consultant Services	$69,470.00
Markup on Professional Services	$10,421.00
Total Costs	**$446,094.00**

[1] Costs may be shifted between line items upon written approval from the State Water Board Project Manager. Any costs exceeding the total amount requested will require an amendment to this work plan.

Budget Assumptions:

- Assumptions for specific tasks are listed in the table in Section B.
- Expenses and Supplies includes:
  - $1,000 Mailing and Printing Supplies (Task 2)
- Travel includes:
  - One (1) site visit at each CWS will be conducted and up to three (3) site visits to wells or source water options within and one mile beyond the MCCSD Service Area Boundary (Task 5).
  - Two (2) in-person public meetings (Task 2)
  - One (1) in-person site visit (Task 6)
- Professional and Consultant Services includes:
  - West Business Development Center (Task 2)
- Stakeholders will respond to RFI and send requested data within 30 days.
- Project management accounts for 12 months of effort.

D. California Environmental Quality Act (CEQA) Certification

Please indicate if all the work you will implement in connection with this work plan is consistent with one of the following CEQA exemptions:

☒ Feasibility and planning studies with no ground disturbing activities (California Code Regulations., Title 14, § 15262)

☐ Includes information collection via pilot studies, test wells, boreholes, etc. (California Code Regulations., Title 14, § 15306)

If proposed work includes ground disturbing activities in an area(s) with a potential for environmental impacts, including riparian habitat, wetland, endangered species habitat or sensitive cultural resources areas, you must notify your State Water Board Project Manager of the nature and scope of such work and receive approval prior to commencing ground disturbing activities.

E. Environmental Conditions

If this work plan includes the development of environmental documents required by the CEQA or by the environmental application package of a funding application for a construction project, the Recipient agrees to the following conditions:

- The Recipient shall not identify the State Water Board as the CEQA Lead Agency for the construction project without prior coordination with and written consent from the State Water Board, Division of Financial Assistance (Division), Environmental Section. The State Water Board generally will not consent to be the CEQA Lead Agency if the TA recipient is a public entity.

- The Recipient shall inform the Division if a CEQA Lead Agency (such as the city or county) has not been identified for the construction project. The Division will coordinate with the Recipient and local public agencies where the construction project is located, as applicable, to identify the CEQA Lead Agency for the construction project.

- If an agency other than the State Water Board is identified as the CEQA Lead Agency for the construction project, the Recipient shall coordinate with the CEQA Lead Agency to determine the appropriate CEQA documents to be prepared for the construction project and to submit all final CEQA documents and notices for the construction project to the Governor's Office of Planning and Research, State Clearinghouse. The Recipient shall be responsible for the California Department of Fish and Wildlife (CDFW), CEQA Environmental Document Filing Fees. A copy of all such CEQA documents and notices shall be submitted to the Division via the Financial Assistance Application Submittal Tool (FAAST).

- If the State Water Board consents to be the CEQA Lead Agency for the construction project, the Recipient shall coordinate with the Division to determine the appropriate CEQA documents to be prepared for the construction project, and the following conditions shall apply:

- The State Water Board is solely responsible for carrying out consultations with Native American tribes for compliance with Assembly Bill (AB) 52. The Recipient and/or the environmental consultant is not authorized and shall not initiate any such consultations. For further guidance on AB 52 requirements contact Division's Environmental Review Staff and/or the Project Manager.

- The Recipient shall coordinate with the Division and provide all technical studies needed to support CEQA findings such as, California Emissions Estimator Model (CalEEMod) outputs, a biological report, a cultural resources report, a wetland delineation report and a geotechnical report. The Recipient shall prepare and submit all CEQA document(s), appendices to the CEQA document, public comments received (including response to comments), and notices agreed upon after consultation with the Division for the construction project for review and written approval by the Division.

- The CEQA documents and notices shall be prepared to meet the Web Content Accessibility Guidelines 2.1 Level AA Standards in addition to the requirements of Section 508 of the Rehabilitation Act of 1973, as amended (29 U.S.C. § 794d).

- The Recipient shall be responsible for the CDFW, CEQA Environmental Document Filing Fees due to the Governor's Office of Planning and Research, State Clearinghouse upon the Division's adoption of the CEQA document and approval of the construction project. The Recipient shall coordinate with the Division prior to paying the CDFW filing fees.

- The Recipient shall submit to the Division a Biological Assessment Report or an updated previously prepared Biological Assessment Report for the construction project that meets the requirements of Section 7 of the Endangered Species Act (ESA) for the purposes of initiating consultation with the United States Fish and Wildlife Service and/or the National Marine Fisheries Service. This condition applies to (1) all projects that receive Clean Water State Revolving Fund funding, (2) all projects that receive Drinking Water State Revolving Fund funding that are subject to Tier I environmental review, and (3) other projects, at the discretion of the Division. For applicability of this condition and further guidance on Section 7, ESA requirements contact Division's Environmental Review Staff and/or the Project Manager.

- The Recipient shall submit to the Division a Historic Properties Identification Report (HPIR) or an updated previously prepared HPIR for the construction project, authored by a qualified archaeologist that meets the requirements of Section 106 of the National Historic Preservation Act (NHPA) for the purposes of initiating consultation with the Office of Historic Preservation. This condition applies to (1) all projects that receive Clean Water State Revolving Fund funding, (2) all projects that receive Drinking Water State Revolving Fund funding that are subject to Tier I environmental review, and (3) other projects, at the discretion of the Division. For applicability of this condition and further guidance on Section 106, NHPA requirements contact Division's Environmental Review Staff and/or the Project Manager.

- During the term of this planning Agreement, the Recipient shall request approval of any change(s) to the Scope of Work of the construction project before making those changes. Thereafter, the Division shall notify the Recipient whether additional environmental review is necessary as a result of the change(s).

- The Recipient shall not initiate any ground disturbing/construction activities unless and until the environmental review process is complete and all applicable notices are filed by the CEQA Lead Agency.

F. Additional Work Plan Conditions

- This work plan is subject to cancellation if two or more deliverable due dates are missed, or if work and work products are not adequate. In implementing this work plan, the Recipient agrees to advance the mission of the Safe and Affordable Funding for Equity and Resilience (SAFER) Program, and to provide consistent, accurate messaging, as agreed upon working in cooperation with State Water Board staff and other relevant stakeholders.
- This work plan is also subject to cancellation if the Recipient fails to work cooperatively with the State Water Board in advancing the goals of the SAFER program, including messaging at public meetings, communication with assistance recipients, and solution proposals. Tasks conducted under this work plan shall not be disruptive to the implementation of solutions within a community, as determined by the Division.
- Any access or right-of-entry agreements developed pursuant to this workplan must ensure that the State Water Board, the State Auditor, or any authorized representative of the foregoing, will have safe and suitable access to the project site at all reasonable times through the useful life of the project.

APPENDIX II

Excerpt from Mendocino Unified School District, Recycled Water System Project: Initial Study/Mitigated Negative Declaration, February 23, 2022

1. Project Information

Project Title	Recycled Water System Project
Lead Agency Name & Address	Mendocino Unified School District 44141 Little Lake Road, Mendocino, CA 95460
Contact Person & Phone Number	Jason Morse, Superintendent (707) 937-5868 / jmorse@mcn.org
Project Location	The Project area extends from the Mendocino City Community Services District wastewater treatment plant at 10500 Kelly Street in the unincorporated Town of Mendocino, along Ukiah Street, Kasten Street, Little Lake Street, Lansing Street, Little Lake Road, School Street, State Route 1, and at Mendocino High School, Friendship Park, Mendocino K-8 School, and a tank site at 44020 Little Lake Road within unincorporated Mendocino County.
General Plan Land Use Designation	General Plan land use designations vary along the Project alignment. The property at 44020 Little Lake Road is designated as "Public and Semi-Public Facilities".
Zoning	Zoning districts vary along the Project alignment. The property at 44020 Little Lake Road has a "Public Facilities" zoning designation.

1.1 CEQA Requirements

The Mendocino Unified School District (MUSD), serving as the California Environmental Quality Act (CEQA) Lead Agency, has prepared this Initial Study to provide the public, responsible agencies, and trustee agencies with information about the potential environmental effects of the proposed Recycled Water System Project (hereafter referred to as the "Project"). The Project would expand the use of recycled water on properties owned by the MUSD to offset potable water use and provide additional fire water storage and supply.

The purpose of this Initial Study is to provide a basis for deciding whether to prepare an Environmental Impact Report, a Mitigated Negative Declaration or a Negative Declaration. This Initial Study has been prepared to satisfy the requirements of CEQA (Public Resources Code, Div 13, Sec 21000-21177) and the CEQA Guidelines (California Code of Regulations, Title 14, Sec 15000-15387). Section 15063(d) of the State CEQA Guidelines states the content requirements of an Initial Study as follows:

1. A description of the project including the location of the project;
2. An identification of the environmental setting;
3. An identification of environmental effects by use of a checklist, matrix, or other method, provided that entries on a checklist or other form are briefly explained to indicate that there is some evidence to support the entries;

4. A discussion of the ways to mitigate the significant effects identified, if any;
5. An examination of whether the project would be consistent with existing zoning, plans, and other applicable land use controls;
6. The name of the person or persons who prepared or participated in the Initial Study.

1.2 Project Background

The MUSD's potable water supply and distribution systems currently consists of two groundwater wells, two storage tanks and distribution piping. The system is used to supply both potable water and irrigation water to facilities and properties owned by the MUSD, which are the K-8 School, Friendship Park, the Community Center, and Mendocino High School. Drought conditions in the region have resulted in decreased groundwater levels during the dry summer season and increased risk of loss due to catastrophic fires. These conditions increase water shortages, and the lack of adequate water supply can limit fire response options even during normal or wet years.

The Mendocino City Community Services District (MCCSD) currently supplies a limited amount of recycled water to irrigate athletic fields at Mendocino High School. In 2018, the MUSD was awarded grant funding under the Clean Water State Revolving Fund (CWSRF) to address requirements and recommendations as outlined in the State Water Resources Control Board (SWRCB) Title 22 Code of Regulations related to the expanded use of recycled water at its facilities.

Increasing recycled water storage and use will increase the available potable water supply, reduce usage of limited groundwater resources for irrigation, and increase available fire water storage. Thus, the purpose of the Project is to expand the use of the recycled water from the MCCSD WWTF to other MUSD sites to offset existing potable water use and provide additional fire water storage and supply.

1.3 Project Location and Existing Setting

The proposed Project would expand the use of recycled water on properties owned by the MUSD to offset potable water use and provide additional fire water storage and supply (see Figure 1, Project Area Map). The Project includes new recycled water pipelines, irrigation systems, fire hydrants, and a new recycled water storage tank (see Figure 2, Recycled Water System Overview Map). Please see Appendix A for additional project drawings.

Recycled water pipelines would be constructed within portions of the Mendocino County right-of-way on Kelly Street, Ukiah Street, Kasten Street, Little Lake Street, Lansing Street, Little Lake Road, School Street, and within the State right-of way within State Route 1. A new irrigation system would be installed at Friendship Park, and recycled water irrigation services would be provided to Mendocino High School and the K-8 School. A recycled water storage tank would be installed at MUSD-owned property at 44020 Little Lake Road.

Surrounding land uses include single family residential homes, churches, schools, residential inns, commercial land uses, cemetery, and a fire station. A portion of the proposed recycled water alignment would be located within historical zones and adjacent to historic landmarks and/or historically important built environment resources. The Mendocino County Historical Preservation District Ordinance designates the area of Mendocino that is located on the Mendocino Headlands peninsula, west of Highway 1, as Historical Zone A. Within Historical Zone A, the Mendocino and Headlands Historic District, located generally south of Little Lake Street, is listed on the National Register of Historic Places (Number 71000165) and on the California Register of Historical Resources. The area of Mendocino east of Highway 1 constitutes Historical Zone B.

The Project is located within the Big River watershed and within a designated coastal zone subject to the Coastal Zone Management Act. The Project area is underlain by groundwater basin number 1-021, the Fort Bragg Terrace Area (CDWR 2020), which is not mapped by the Environmental Protection Agency (EPA) as a sole source aquifer recharge area and is not identified as an overdrafted groundwater basin. The Project site is not located within a mapped 100-year or 500-year flood zone (FEMA 2017).

The Project site is not located within an active Alquist-Priolo earthquake fault zone and no other active or potentially active faults have been mapped within the area. The Project site is located approximately 0.5 mile north of the Big River and does not contain any aquatic habitat or intersect any riparian corridors.

The Project is located within the North Coast Mendocino County sub-basin of the North Coast Air Basin, which is within the jurisdiction of the Mendocino County Air Quality Management District (MCAQMD). The North Coast Mendocino County sub-basin, like the rest of Mendocino County, is designated as a non-attainment area for the State particulate matter (PM10) standard (ARB 2018). The sub-basin is in attainment for all other State standards and for all Federal criteria air pollutants (ARB 2018, U.S. EPA 2020).

Many large overstory trees remain intact on residential lots adjacent to the Project alignment, typically over a maintained understory, residences, and driveways. To the south and east of the Project area, there is a gradual transition to forested open space at varying distances, including Big River State Park to the south. None of the open space directly borders or closely approaches the Project area. No critical habitat has been designated for federally-listed species within the Project area.

Existing facilities at the proposed recycled water tank site include two in-service water storage tanks (one wooden tank and one steel tank), two in-service groundwater supply wells, a water treatment building, water distribution piping, maintenance building, two shallow decommissioned/abandoned water supply wells, a pump house that has been converted into a student radio transmission station, and a graded access road. The location of the proposed recycled water tank is accessible via a graded access road from the maintenance building off Little Lake Road.

1.4 Project Description

The proposed Project would expand the use of recycled water on properties owned by the MUSD to offset potable water use and provide additional fire water storage and supply. The proposed Project would decommission and replace existing recycled water system improvements with newer facilities, including construction of new recycled water pipelines, irrigation systems, fire hydrants, and a new recycled water storage tank. A description of the proposed recycled water distribution system and construction activity is provided below.

Decommissioning of Existing Facilities

The Project would disconnect and abandon an existing 2-inch pipe used to transfer recycled water from the MCCSD WWTP to an existing 55,000-gallon concrete tank at Mendocino High School. The existing 55,000-gallon concrete tank and irrigation booster pumps at Mendocino High School would be disconnected from the irrigation system and from the 2-inch pipe used to transfer recycled water from the MCCSD WWTP. The concrete tank would be left in place. At Friendship Park, an existing 8,000-gallon underground concrete tank would be disconnected from the irrigation system and left in place, and an existing irrigation system at Friendship Park would disconnected from the potable water system and abandoned in place.

New Recycled Water Distribution System

The Project would construct approximately 1.5 miles of new recycled water distribution mains. The proposed distribution pipeline would be 12-inch nominal diameter to provide acceptable fire flows during an emergency. A County of Mendocino encroachment permit would be required for installation of mains within County right-of-way, and a Caltrans encroachment permit and transportation permit would be required for installation of the pipeline segment beneath State Highway 1.

Installation of the proposed pipeline beneath Highway 1 would be installed via trenchless construction methods using a minimum 18-inch diameter steel casing for PVC pipe or 24-inch diameter HDPE casing for HDPE pipe. The casing would extend beyond the State right-of-way on both sides of Highway 1. Gate valves would be installed on each leg of every tee and services 3-inches and larger.

New Recycled Water Service Connections

The Project would provide new recycled water service connections at Mendocino High School, Friendship Park and the MUSD K-8 School. Each service connection would include a main isolation valve, water meter and backflow prevention device. Proposed service connections at Mendocino High School and the MUSD K-8 School would connect to existing irrigation systems. A new popup spray irrigation system is proposed for Friendship Park, which would replace an existing irrigation system that would be abandoned. The existing irrigation controller and valves at Friendship Park would be removed and a new irrigation controller and valves would be installed. The irrigation system would be zoned similar to those at Montgomery High School, and all boxes, covers and appurtenances would be of purple color and labeled with "Recycled Water – Do Not Drink" to signify use of recycled water.

New Recycled Water Fire Hydrants

The Project would install approximately 15 new fire hydrants throughout the new distribution system. The proposed fire hydrants would be equipped with break-off check valves and would include a gate valve on the service for isolation from the main. The final fire hydrant model selection and features was confirmed by the County of Mendocino Fire Marshal and Fire Department during detailed design, and also would be required to adhere to the design requirements of the Mendocino Historical Review Board to ensure compatibility with the historical design character of the Town.

New Recycled Water Storage Tank and Appurtenant Facilities

The Project would construct a new 250,000-gallon bolted stainless steel recycled water storage tank at the MUSD tank site on Little Lake Road east of Highway 1. The proposed tank would be approximately 40 feet in diameter and approximately 40 feet in height. The tank would include a water level sensor, magnetic flowmeter, residual chlorine analyzer, sodium hypochlorite chlorination system, tank level alarms, and SCADA system. The new tank would be constructed using slab-on-grade foundations resting on engineered fill materials. Seismic design of the new tank would conform to the most recent version of the California Building Code (CBC), ASCE 7-2010, ACI 318/350/372 and the AWWA D110 design standards with any local amendments. The tank would utilize flexible piping and other connections to minimize damage during a seismic event in accordance with site-specific geotechnical recommendations. A 10-foot wide gravel apron would be constructed around the perimeter of the new tank with a perforated pipe drain, as needed to keep subgrade from becoming saturated and direct any runoff from the tank roof to overflow point and away from the tank.

The proposed recycled water storage has been sized to provide sufficient storage capacity for the recommended operational storage as well as for fire flows. Operation storage is the volume of water

required to meet the average day maximum month demands associated with the irrigation athletic fields located at Mendocino High School, Friendship Park and the MUSD K-8 School. The maximum month irrigation demand was identified as 30,070 gpd. The fire water storage is determined as the volume required to sustain a flowrate of 1,500 gallons per minute (gpm) at one fire hydrant for a 2-hour duration. At this rate, the minimum recommended fire water storage volume is 180,000 gallons. The total recycled water storage volume was determined as the sum of the operational storage volume and the fire water storage volume. A factor of 1.2 was applied to account for peak day irrigation demands, modest growth in recycled water demand and additional community fire water storage. The resulting total recycled water storage volume was 252,084 gallons.

MCCSD Wastewater Treatment Plant Improvements

Several improvements are currently planned at the MCCSD WWTP that would enable the expansion of recycled water use. The improvements were evaluated as part of a separate CEQA review conducted by the MCCSD in 2018. The improvements include upgrades to the existing WWTP at 10500 Kelly Street, including:

- New chlorination system
- New below-grade chlorine contact chamber and recycled water storage
- New recycled water pumping system
- Recycled water piping to distribution system point of connection at Kelly Street / Ukiah Street
- SCADA monitoring and control equipment for tank level and water quality monitoring

Project Construction

A description of the proposed Project construction activities is provided below.

Construction Duration and Hours

Construction of the Project is expected to begin in 2023 and is conservatively assumed to require approximately 10 months to complete, taking into account time for mobilization, demobilization, and wet weather delays. Construction activities would generally occur Monday to Friday, 8 AM to 5 PM. The Project is not anticipated to require nighttime construction work or construction on weekends or legal holidays.

Construction Staging

Prior to construction, the contractor and its subcontractors would mobilize resources to staging areas. This would include transport of construction vehicles and equipment, as well as delivery and storage of construction materials. The contractor may also secure a job site trailer and portable sanitary facilities at certain staging areas. Several staging areas may be used to store construction materials and equipment during construction. Construction staging within and adjacent to County of Mendocino road rights-of-way would occur along various portions of the alignment in areas where work was occurring. This type of staging would generally include short-term staging of construction equipment and materials along residential streets where curbside parking is available or on undeveloped properties. Notifications to adjacent residences would be provided in advance of such work and staging, and the contractor would be required to enter into an agreement with property owners for use of private property.

Construction Equipment

A variety of construction equipment would be used to build the Project. This would include, but not necessarily be limited to, excavators, backhoes, front end loaders, scrapers, graders, concrete saws, cranes, jackhammers, impact driver for shoring installation, winches, chainsaws, forklifts, rollers, asphalt road pavers, compactors, air compressors, generator sets, and pneumatic tools. A variety of trucks including cement mixers, haul trucks, and water trucks would also be required.

System Decommissioning

Project construction activities would include abandonment of existing recycled water pipelines from the MCCSD WWTP to Mendocino High School, as well as an existing 55,000-gallon concrete tank and irrigation booster pumps at Mendocino High School. At Friendship Park, an existing 8,000-gallon underground concrete tank would be disconnected from the irrigation system, and an existing irrigation system would be abandoned. These activities would require the use of construction equipment such as an excavator, bulldozer, backhoe, grader, and concrete saws. Additional equipment likely to be used would include air compressors, generator sets, and pneumatic and electric powered tools.

Pipeline Construction

The proposed recycled water pipeline would be installed using a combination of open-trench methods and horizontal directional drilling (HDD). Underground utility mains would be identified and labeled in the field prior to construction, including sanitary sewer, water, electrical, natural gas, telecommunications, storm drains, streetlights, and other fiber optic lines. Potholing may be implemented along portions of the alignment to further confirm utility locations, which would include the digging of test holes to uncover utilities to help ascertain horizontal and vertical locations. The Project is being designed to minimize displacement of existing utilities to the extent feasible. However, in some locations, existing gas, water, electrical, and fiber optic lines would potentially need to be relocated within the road right-of-way to accommodate the Project.

In accordance with County of Mendocino and Caltrans requirements, the construction contractor would be required to obtain an applicable encroachment permit from the County for work within County roadways, and from Caltrans prior to work within the Highway 1 right-of-way. The encroachment permit applications would, in both cases, require the development and implementation of traffic and pedestrian control plans to preserve access and ensure public safety, which would typically include:

- Traffic controls, signs, and flaggers conforming with current California Manual of Uniform Traffic Control Devices
- Pedestrian and bicycle control devices
- Notifications/arrangements to public for any driveway access restrictions
- Notifications to public transit agencies, emergency responders, and school systems
- Scheduling of major lane/road closures during off-peak hours

The majority of the proposed recycled water pipeline would be installed using open-trench methods. Under this method, the construction sequence would typically include removing the ground surface along the pipeline alignment; excavating a trench; preparing and installing pipeline section; installing vaults, manholes, and other pipeline components; backfilling the trench with non-expansive fills; restoring preconstruction contours; and revegetating and paving the pipeline alignments. The maximum amount of open trench permitted in any one location would be the length necessary to accommodate the amount of pipe installed and backfilled in a single day. Trenches would be fully backfilled at the end of each day or, in

lieu thereof, would be covered by heavy steel plates adequately braced and capable of supporting vehicular traffic in those locations where it is impractical to backfill at the end of each day. Pipelines would be installed at depths ranging from approximately 3 to 6 feet below ground surface.

The installation of the proposed recycled water pipeline beneath Highway 1 would be tunneled using HDD techniques. HDD is a guided, steerable drilling system used for the trenchless installation of pipes, conduits, and cables. A pilot bore path would be excavated in a shallow arc from a surface-launched drill rig. Excavation would take place with fluid assisted cutting from a drilling tool on the drill string. As a final step, the carrier pipe would be pulled into the fluid-stabilized bore. Typical construction equipment for the HDD method would include drilling rigs, excavators, crane, rough terrain fork lift, mud pumping units, material separation plants, frac tanks, and vacuum trucks. The depth of the pipe would range between approximately 4 and 22 feet below Highway 1.

If needed, temporary groundwater dewatering would be conducted to provide a dry work area in trench excavations. Dewatering would involve pumping water out of a trench. Groundwater would typically be pumped to Baker tanks (or other similar type of settling tank). Following the settling process provided by a tank, the groundwater would typically be pumped to a bag and cartridge filter system (or similar system) before being discharged under permit to the sanitary sewer system.

Tank Construction

The proposed new recycled water tank would be constructed using slab-on-grade foundations resting on engineered fill materials. Seismic design of the new tank would conform to the most recent version of the California Building Code (CBC), ASCE 7-2010, ACI 318/350/372 and the AWWA D110 design standards with any local amendments. The tank would utilize flexible piping and other connections to minimize damage during a seismic event in accordance with site-specific geotechnical recommendations.

Restoration

Existing paving, curbs, gutters, sidewalks, utilities, landscaping, irrigation systems, planting and other improvements that would be removed, damaged or disturbed due to the installation of the recycled water facilities would be replaced in kind to pre-existing conditions or better. Restoration of paved areas would be in accordance with the requirements of Mendocino County standards and Caltrans Specifications and Standards Section 39 Asphalt Concrete. Pavement restoration and other facilities restoration would be constructed to finish grades compatible with adjacent undisturbed pavement and other facilities (i.e., valve lids, manhole covers, etc.). Damaged pavement striping also would be replaced in kind. Wherever sidewalks are removed for purposes of construction, the suitable temporary sidewalks would be installed promptly after backfilling and would be maintained in satisfactory condition until the final restoration there has been made.

Waste Management

Site preparation, including demolition, clearing and grading of the Project site as necessary would require the removal and off-haul of materials. This would include, but not necessarily be limited to, vegetation, concrete, asphalt and fill, and certain existing utilities that would be removed and replaced. The Project contractor would be required to develop and implement a waste management plan according to ASTM E 1609 and the Project specifications, including measures to divert construction waste from landfills by using recycling, reuse, salvage, and other diversion programs. Materials that could not be reused or composted at local facilities would be disposed of at regional landfills.